

**United States District Court  
Northern District of Texas  
Fort Worth Division**

STATE OF TEXAS,

*Plaintiff,*

v.

JOSEPH R. BIDEN, JR., *et al.*;

*Defendants.*

Case 4:21-cv-00579-P

**Plaintiff's Supplement to Its Brief Supporting Its  
Renewed Motion for Preliminary Injunction**

**A. Updated UAC numbers**

Since the original brief supporting Texas's renewed motion for preliminary injunction, the number of unaccompanied alien children encountered by the United States Border Patrol at the southwest border have remained elevated: 18,806 in August, 14,358 in September, 12,779 in October, 13,934 in November, 11,893 in December, and 8,777 in January 2022. *See* <https://www.cbp.gov/newsroom/stats/southwest-land-border-encounters> (last visited February 28, 2022).

**B. Updated Title 42 application numbers**

Similarly, the number of family units subjected to Title 42 has remained low. After reaching a nadir of 12% in July 2021, the percentage of family units processed under Title 42 has remained low, generally hovering around 25% and not once reaching one in three.

Month	Family-unit encounters	Title 42 applications to family units	
		Absolute	Percentage
November 2020	4,302	3,641	84.6
December 2020	4,406	3,332	75.6
January 2021	7,296	4,546	62.3

Month	Family-unit encounters	Title 42 applications to family units	
		Absolute	Percentage
February 2021	19,590	9,478	48.4
March 2021	54,132	21,572	39.9
April 2021	50,094	17,930	35.8
May 2021	44,747	9,320	20.8
June 2021	55,896	8,028	14.4
July 2021	83,499	10,110	12.1
August 2021	86,631	17,070	19.7
September 2021	64,388	17,599	27.3
October 2021	42,799	13,359	31.2
November 2021	45,062	11,566	25.7
December 2021	51,736	11,503	22.2
January 2022	31,795	8,333	26.2

*Id.*

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**Certificate of Service**

I certify that on February 28, 2022, this document was filed through the Court's CM/ECF system, which automatically served it upon all counsel of record.

/s/ Leif A. Olson